

1 **RIKLIS LAW, PLLC**  
KRISTOFER RIKLIS  
2 Nevada Bar No. 14754  
871 Coronado Center Dr., Suite 200  
3 Henderson, NV 89052  
Telephone: (702) 720-6471  
4 [Kristofer@riklistlaw.com](mailto:Kristofer@riklistlaw.com)

5 Attorney for CHRISTOPHER J. HADNAGY and  
SOCIAL-ENGINEER, LLC  
6

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA  
9

10 CHRISTOPHER J. HADNAGY, an  
individual; and SOCIAL-ENGINEER, LLC, a  
Pennsylvania limited liability company,  
11

12 Plaintiffs,

13 v.

14 JEFF MOSS, an individual; DEF CON  
COMMUNICATIONS, INC., a Washington  
corporation; and DOES 1-10; and ROE  
15 ENTITIES 1-10, inclusive,

16 Defendants.  
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Case No.: 2:23-cv-01345-CDS-BNW

**DECLARATION OF CHRISTOPHER J.  
HADNAGY IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN  
OPPOSITION TO DEFENDANTS'  
MOTION TO TRANSFER VENUE [ECF  
NO. 15]**

**DECLARATION OF CHRISTOPHER J. HADNAGY IN SUPPORT OF PLAINTIFFS’  
RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO TRANSFER VENUE  
[ECF NO. 15]**

I, Christopher J. Hadnagy, under penalty of perjury, declare that the following is true and correct:

1. I, Christopher J. Hadnagy, am over eighteen (18) years of age, and of sound mind and body. I am competent to give this affidavit, and it is based upon my own personal knowledge. I understand that this affidavit will be presented to the United States District Court of the District of Nevada, in the above-captioned civil action.

2. I presently reside in Florida.

3. In 2010, I commenced offering social engineering services by writing books and articles, offering classes and lectures, and attending and presenting at conferences. In 2013, I formed Social-Engineer, LLC as a single member limited liability company in Pennsylvania (“SE”). SE and I attended annual trade shows in Las Vegas, Nevada for business purposes from 2010 - 2019. These shows included Def Con Communications, Inc.’s annual Conference (the, “Event”). They also included Black Hat USA’s annual conference.

4. As part of SE’s participation in the annual conference hosted by Def Con Communications, Inc. (the “Event”), SE set up a booth that weighs two thousand (2,000) pounds at the venue, in addition to signage and a lot of other equipment for the 4 days of events we ran at the Event. Beginning in 2018, SE stored the booth year-round in a leased storage unit in Clark County, Nevada. SE continues to maintain said lease where the booth remains.

5. SE’s current employees reside in Pennsylvania, Rhode Island, Florida, Texas and Colorado. Most of SE’s employees have attended the Event with SE at some point.

6. The last time that SE had an employee who resided in Washington was approximately 2013.

7. Over the past ten (10) years, SE and I have visited Washington one time. The last time SE had a Washington-based client was 2017.

8. In previously held proceedings in the United States District Court in the Eastern District

of Pennsylvania, the Defendants in this Action, Jeff Moss and Def Con Communications, Inc. (“Defendants”) provided their Initial Rule 26 Disclosures.<sup>1</sup> In that prior action, Defendants provided their Initial Rule 26 Disclosures on September 25, 2022. A true and correct copy of Defendants’ counsel’s email transmission of the Disclosures to my prior counsel is attached hereto as Exhibit “1”.

9. Exhibit “1” contains reference to the following individuals with whom I am personally familiar:

- a. Neil Wyler: I have known Mr. Wyler for 14 years, and have met with him on a recurring basis at the Event as well as at Black Hat. Based on my personal and professional knowledge, I am informed and believe that he resides in Utah.
- b. Maxie Reynolds: I have known Ms. Reynolds for 3.5 years. She was an employee of SE. Based on my personal and professional knowledge, I am informed and believe that she resides in California.

10. I would encounter considerably more hardship if forced to litigate these claims in Washington as opposed to Nevada. I presently have no business connections or dealings in Washington and I do not have information pertaining to any legal counsel in Washington. Based on personal recollection and all available information, I have only been to Washington one time over the past 10 years. On the other hand, over the 9 years preceding the Covid-19 pandemic, I traveled to Nevada regularly for approximately two weeks every year. I am very familiar with Nevada which is more accessible and economically convenient for me than Washington.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: October 30, 2023

/s/ Christopher Hadnagy  
Christopher Hadnagy

<sup>1</sup> *Hadnagy, et al. v. Moss, et al.*, No. CV22-3060 2023 WL 114689 (E.D. Pa. Jan. 5, 2023).

**INDEX OF EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Title</u></b>	<b><u>Page Numbers</u></b>
1	Defendants' Disclosures in Prior Action	147-154

**CERTIFICATE OF SERVICE**

I, Kristofer Riklis, hereby certify that the foregoing:

**DECLARATION OF CHRISTOPHER J. HADNAGY IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO  
TRANSFER VENUE [ECF NO. 15]**

was submitted electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system on the 30th day of October, 2023. Electronic service of the foregoing document was be made in accordance with the E-Service List as follows:

Robert J. Cassity  
Erica C. Medley  
**Holland & Hart LLP**  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
bcassity@hollandhart.com  
ecmedley@hollandhart.com  
*Attorneys for Defendants*

David A. Perez  
**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
dperez@perkinscoie.com  
*Attorneys for Defendants*

Matthew J. Mertens  
**PERKINS COIE LLP**  
1120 N.W. Couch Street 10th Floor  
Portland, OR 97209-4128  
mmertens@perkinscoie.com

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to: N/A

/s/ Kristofer Riklis  
KRISTOFER RIKLIS, Esq.